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Organization:

Title:

Comments: Dear Ms. Schmidgall,

As a former resident of Oregon who holds great affection for the public forests of my home state, I urge you to withdraw the old-growth logging components of the 'QMS Project' on the Sweet Home Ranger District. The proposed logging defies and disregards the overriding importance of mature forest stands and is premised upon the false notion that such stands are not precious, scarce, refuges of biodiversity and reservoirs of carbon. For the Willamette staff to entertain logging such mature stands is a pointed refutation of the progress we thought the Forest service has made in ecosystem management, and in understanding the broader context of the global climate crisis and biodiversity meltdown in which it operates.

The stated purpose 'to create diversity in structure in age class' is a justification that has been offered for many similar logging projects in the past, and always in negligence of the larger landscape context, in which 'young stands' and 'forest openings' are already abundant. This has become truer recently due to the nearby fires in the North Santiam and McKenzie. The notion that the Forest service should create more 'young stands' and 'forest openings' is plausible only with a facile, implausibly small area of analysis to describe current conditions.

The assertion of need to 'identify and manage a sustainable minimum road system' is a circular trick of verbal bootstrapping, as the QMS project itself is the only purpose served by the new or reopened roads. The 'identification' of roads obviously does not require reopening and rebuilding them, and absent QMS, the Forest service could pursue the urgent project of permanently retiring and revegetating old roadbeds. Identifying these scars that bleed sediments into our waterways is an easy task, and healing them rather than post-facto justifying them is a better use of Forest Service's resources. Rather than 'reopening 27 miles' and bulldozing another 5 miles, the Forest service should separate close all roads not needed in a reasonably foreseeable future for reasonable management access, and without yoking this to an unreasonable logging project.

Some areas of QMS involve tree plantations that do require thinning to accelerate growth and increase the biodiversity these stands can support, and these are the positive elements that the Forest service should pursue. Old-growth forest requires so much 'treatment' and its ecological value will be severely harmed by Alternative 2, in negligence and defiance of the demand for its preservation due to both evolving social values and the deterioration of Earth's life support system. This part of QMS appears to reflect the seemingly interminable inertia of the Forest service timber program from a generation ago, which agency staff stubbornly refuse to discard no matter how deleterious it becomes.

By contrast, Alternative 4 would still produce a staggering 50-60 million board feet of timber, doing more than your fair share of timber production, without invading old-growth stands. Alternative 4 is the most socially benign option, and should be modified to conduct logging only from existing roads.

Sincerely,

Jim Steitz